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Draft

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: Waste Water Pilot Plant RD & D Permit

Meeting Held March 19, 1992
1100 Jadwin Avenue
Room 335
Richland, Washington

Appvl. _____ Date: _____
Clifford E. Clark, EAP, DOE-RL

Appvl. _____ Date: _____
Daniel L. Duncan, Environmental Protection Agency Region 10, RCRA
Program Manager

Appvl. Not Present Date: _____
Paul Stasch, RCRA Unit Supervisor, Washington State Department of
Ecology

Appvl. _____ Date: _____
Steven J. Skurla, WHC, Contractor Representative

PURPOSE:
Meeting Minutes are attached. These minutes are from the C-018 RD & D Permit
held March 19, 1992. Minutes are comprised of the following:

- Attachment 1 - Summary of Discussion and Commitments
- Attachment 2 - Attendance List
- Attachment 3 - Agenda
- Attachment 4 - Commitments/Agreements Status
- Attachment 5 - RD&D Permit Application Schedule
- Attachment 6 - Draft Chapters 3 and 4 from the RD&D Application



X EPA
[Signature]

Distribution:

C. Clark	DOE-RL (A5-15)
D. Duncan	EPA (HW-074) 124)
J. King	SWEC (A4-35)
C. Massimino	EPA (HW-074)
T. Michelena	Ecology
S. Price	WHC (H4-57)
D. Sherwood	EPA (B5-01)
S. Skurla	WHC (H4-57)
P. Stasch	Ecology

Please send comments on distribution list to Joe King, A4-35, (509) 376-4726.

ADMINISTRATIVE RECORD: RD&D Permit
[Care of Susan Wray, WHC (H4-22)]

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Attachment I

Waste Water Pilot Plant RD & D Permit Meeting
March 19, 1992

Summary of Discussion and Commitments

Minutes of the February 6, 1992 Waste Water Pilot Plant RD & D were signed.

WHC provided copies of the schedule for the completion of the Waste Water Pilot Plant RD & D application (Attachment 5). It was noted that the scheduled date for delivery of the ~~combined application for the permit and the combined application for the permit and the combined application for the permit~~ ~~to the Department of Ecology on March 23, 1992~~ ~~The combined application for the permit and the combined application for the permit~~ scheduled to be delivered to the ~~Department of Ecology on March 23, 1992~~. The status of the Notice of Deficiency (NOD) response table is that the work has been completed by WHC on Revision 1, and it is undergoing WHC/RL review.

The draft of Chapters 3 and 4 of the Wastewater Pilot Plant RD & D application were provided to EPA and are also to be provided to Ecology (See Attachment 6). Included in draft of Chapters 3 and 4 are the critical parameters table, the operating envelop, and the ventilation controls, none of which had previously been provided to the regulators.

In response to EPA's inquiry, RL reviewed Ecology's NOD comments and RL's positions, which include the following:

y Comment: There is no mention of the container management provisions in WAC 173-303-630. Response: For purposes of this permit, the tank trucks will only be TSD regulated when they are stationary at the 1706-KE building. The transportation-related elements of this project will be covered by government regulations for transporting waste and will not be a part of the permit.

y Comment: The individual test plans should be submitted to Ecology for review. Response: RL plans to submit the test plans to Ecology and EPA for review. RL, however, does not consider that submitting test plans for review implies that they are submitted for approval.

y Comment: Ecology expressed concern about substituting equipment by "equivalent technologies." Response: WHC/RL will comply with WAC 173-303 on equivalent technologies and will make the requisite notifications to regulatory authorities. If a substitution were to be made which did not fit the operating parameters specified in the permit, a permit modification would be submitted by RL.

y An incorrect reference was given in the application regarding the testing of filtration systems because of a typographical error.

y Comment: For loading and unloading tank waste, sheet liners are not adequate for containment purposes. Response: Loading and unloading activities at LERF are covered under transportation regulations rather than TSD regulations. On-site waste shipments will be prepared for safe

transport and protection of human health and the environment, but RL does not agree that they are part of the TSD-permitting activity.

y There is a question regarding wipe sampling. RL stated that wipe sampling of ducts will be done before prior to the startup of RD & D operations and again after completion of RD & D operations. The ventilation system will be closed after pilot plant operation and will be dealt with during the decommissioning and demolition (D&D) process.

y Comment: Section 8.3 of the application regarding closure cost estimates is inaccurate. Response: RL is not required to provide closure cost estimates. RL has agreed to provide "anticipated costs of closure," which will give information on the cost of doing the closures using RL's existing cost estimating system and format.

EPA (Duncan) stated that Ecology has sent EPA a letter stating that EPA can issue the Waste Water Pilot Plant RD & D Permit, and therefore, EPA considers itself to be the lead regulatory agency on this project.

EPA will discuss the issue of the transfer of the permit to Ecology, and the regulatory decision on the permit will then be presented to RL. For purposes of conferring with Ecology, EPA is willing to accept specifications provided by the manufacturer rather than require 9090 testing be done by WHC/RL.

ACTION ITEM: Through RL, provide EPA and Ecology with complete specifications for portable berms and the criteria related to driving on them. Action: Donald Scully.

WHC stated that there should be no need to update the tables regarding the stream characteristics in the final version of the application, with the exception that numbers will be added to the volatile organic compound (VOC) column. The column in the application which shows the maximum limits is correct and provides figures based on 10 times the characteristic data.

In response to WHC/RL, EPA indicated that WHC/RL is headed in the right direction on the approach to the RD & D application, although some "fine tuning" will likely be required.

As part of a comment package to the Hanford Permit, WHC/RL has prepared an emergency plan to supplement the unit-specific emergency plans, including the emergency plan in the RD & D application.

The next Waste Water Pilot Plant RD & D meeting is planned as a teleconference on April 1, 1992.

Attachment 2

C-018 RD & D Permit Meeting
March 19, 1992

Attendance List

Teleconference

<u>NAME</u>	<u>ORGANIZATION</u>	<u>PHONE #</u>
1100 Jadwin, Room 335, Richland, Washington:		
C. Clark	RL	(509) 376-9333
D. Duncan	EPA	(206) 553-6693
D. Flyckt	WHC	(509) 373-3985
C. Haass	SWEC	(509) 376-5995
J. King	SWEC	(509) 376-4726
B. Owen	WHC	(509) 373-4967
B. Pavlina	WHC	(509) 376-9131
A. Rodriguez	RL	(509) 372-2207
D. Scully	WHC	(509) 373-5858
S. Skurla	WHC	(509) 376-7957

EPA Region 10 Office, Seattle, Washington:

C. Massimino	EPA	(206) 553-4153
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Attachment 3

AGENDA
Unit Manager Meeting:
Waste Water Pilot Plant RD & D

1100 Jadwin Avenue
Room 335
Richland, Washington
March 19, 1992

- y Status of NOD response
- y Technical discussion
- y Schedule for permit completion
- y Set next meeting date

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Attachment 4

Commitments/Agreements Status List
March 19, 1992

Item No.

Description/Status

3-19-92:1

Through RL, provide EPA and Ecology with complete specifications for portable berms and the criteria related to driving on them. Action: Donald Scully.

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